

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS  
(KANSAS CITY DOCKET)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 09-20133-01/20-CM-JPO

GLADSTONE MCDOWELL,

a.k.a. "The Dread",

UNDER SEAL

MICHAEL FRANCOIS,

a.k.a. "Peter",

a.k.a. "Curtis Pitter",

a.k.a. "Michael Williams",

a.k.a. "Martin Trevor Mario",

a.k.a. "Joseph Stephenson Calvin Melrose",

a.k.a. "Peter Paterson",

a.k.a. "Paule Blake",

a.k.a. "Stephenson Calvin Melrose Joseph",

TAMARY BROWN,

MARLON FORRESTER,

RADELL BRADFORD,

MECHIEEN MCDOWELL,

DWIGHT RHONE,

a.k.a. "Kirk",

THEODORE MCDOWELL,

a.k.a. "Cush",

SHELDON MCINTOSH,

SAMORA MCINTOSH,

IBRAHIMA KANE,

a.k.a. "Abrahima Kane",

STEPHEN BLACKBURN, )  
 )  
 DEIDRE TURNER, )  
 a.k.a. "Deidre Velez", )  
 )  
 MICHAEL WILLIAMS, )  
 )  
 MICHELLE MIDGYETT, )  
 )  
 DENAUD EGANA, )  
 )  
 DELROY BUCKLEY, )  
 a.k.a "Blacks", )  
 )  
 RITA HOLMES-BUCKLEY, )  
 )  
 EULET KING, and )  
 )  
 KEESHA MCDOWELL, )  
 )  
 Defendants. )

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**INDICTMENT**

The Grand Jury charges:

**COUNT 1**

From in or about May, 2000, the exact date being unknown to the Grand Jury, and continuing to on or about November 4, 2009, both dates being approximate and inclusive in the District of Kansas and elsewhere, the defendants,

**GLADSTONE MCDOWELL,**  
**a.k.a. "The Dread",**  
**MICHAEL FRANCOIS,**  
**a.k.a. "Peter",**  
**a.k.a. "Curtis Pitter",**  
**a.k.a. "Michael Williams",**  
**a.k.a. "Martin Trevor Mario",**

**a.k.a. “Joseph Stephenson Calvin Melrose”,  
a.k.a. “Peter Paterson”,  
a.k.a. “Paule Blake”,  
a.k.a. “Stephenson Calvin Melrose Joseph”,  
TAMARY BROWN,  
MARLON FORRESTER,  
RADELL BRADFORD,  
MECHIEEN MCDOWELL,  
DWIGHT RHONE,  
a.k.a. “Kirk”,  
THEODORE MCDOWELL,  
a.k.a. “Cush”,  
SHELDON MCINTOSH,  
SAMORA MCINTOSH,  
IBRAHIMA KANE,  
a.k.a. “Abrahima Kane”,  
STEPHEN BLACKBURN,  
DEIDRE TURNER,  
a.k.a. “Deidre Velez”,  
MICHAEL WILLIAMS,  
MICHELLE MIDGYETT,  
DENAUD EGANA,  
DELROY BUCKLEY,  
a.k.a. “Blacks”,  
RITA HOLMES-BUCKLEY,  
and  
EULET KING,**

knowingly, and intentionally combined, conspired, confederated, and agreed together with each other and with other persons, both known and unknown to the Grand Jury, to intentionally distribute and possess with intent to distribute 1000 kilograms or more of a mixture and substance containing marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(vii).

#### **Overt Acts**

During and in furtherance of the conspiracy to possess and distribute 1000 kilograms or more of marijuana, the defendants committed the following overt acts among others:

1. In May, 2007, Michael Francois using the alias Martin Trevor Mario was arrested in Avondale, Arizona with narcotics packaging material.

2. A search of the Avondale, Arizona residence uncovered a large scale marijuana packaging operation. Inside the residence were Sheldon McIntosh, Samora McIntosh, Theodore McDowell, Dwight Rhone, and Abrahima Kane. The search resulted in the seizure of 30 boxes (294.5 gross kilograms) of marijuana and \$223,228 in cash.

3. In May of 2007, Stephen Blackburn flew to Arizona to claim the \$223,228 in cash that was seized in Avondale, Arizona, claiming the money was proceeds from his church.

4. In November, 2007, Gladstone McDowell and Marlon Forrester were arrested in Oklahoma transporting approximately \$140,000 in cash.

5. Stephen Blackburn initially claimed the seized currency and stated that the money was proceeds from his church.

6. Stephen Blackburn, Mechieen McDowell, and Terry Brown arrived in Oklahoma the next day to post bond for Gladstone McDowell and Marlon Forrester.

7. On February 20, 2008, Tamary Brown and Marlon Forrester attempted to pick up two suspicious packages at a UPS store in Las Vegas, Nevada.

8. The two packages were sent to a UPS drop box rented by Deidre Turner.

9. The package was addressed to Stephenson Joseph, an alias used by Michael Francois.

10. A search of the package revealed it contained \$366,040 in U.S. Currency. The sender of the package was Terry Brown.

11. On May 26, 2008, someone accessed Tamary Brown's My Space account from Miramar, Florida.

12. Agents in Florida observed Gladstone McDowell, Marlon Forrester, and Tamary Brown meeting at the Wingate Hotel, Miramar, Florida.

13. The rooms were rented by Devon Thomas with an address in Hollywood, Florida, but were paid for by Gladstone McDowell.

14. Agents identified (816) 200-8379 as a telephone number used by Gladstone McDowell, and a court ordered wiretap was conducted on that phone number.

15. Intercepted telephone calls identified Tamary Brown as Gladstone McDowell's assistant in the marijuana trafficking business.

16. Keesha McDowell, Gladstone's daughter was identified as the proprietor of the Jamaican Mini Market.

17. Financial analysis of the Jamaican Mini Mart for 2009 showed deposits of only \$19,000.

18. On May 20, 2009, Keesha McDowell deposited \$9,000 in cash into the account of the Jamaican Mini Martet (The \$19,000 included this \$9,000 deposit).

19. The \$9,000 was immediately withdrawn and converted into a cashiers check used to purchase equipment for Malativa Xion Wear, a business owned by Mechieen McDowell.

20. Gladstone McDowell owns approximately 13 properties including 5920 Lawn, Kansas City, Missouri; 1810 E. 67<sup>th</sup> Terrace, Kansas City, Missouri; 8421 Oldham Road, Kansas City, Missouri; 3930 Chestnut Avenue, Kansas City, Missouri; and 4336 Woodland Avenue, Kansas City, Missouri.

21. Agents were able to identify telephone number (210) 625-2821 as being used by Tamary Brown.

22. Intercepts of Tamary Brown's phone revealed she would sell marijuana for Gladstone as well as negotiate with Eulet King in Arizona for the supply of marijuana.

23. On May 11, 2009, Michael Francois telephoned Tamary Brown. Francois was upset because he was expecting a shipment of marijuana to arrive at Michelle Midgyett's house and Michelle was at home with company.

24. Gladstone immediately called Midgyett and told her to leave, which she did.

25. On May 11, 2009, 7 packages were sent to apartment # 17 at 3635 Warrick Avenue, Kansas City, Kansas. The 7 packages had a combined weight of approximately 242 pounds. Utilities checks confirmed there was no apartment # 17. No other packages were sent by UPS to that location on that date.

26. On May 11, 2009, surveillance observed Gladstone McDowell at that apartment complex earlier in the day. Agents followed Gladstone as he left the apartment complex and spoke with an unidentified UPS driver and then returned to the apartment complex later in the day.

27. UPS records confirmed 8 packages were delivered on May 11, 2009, to Michelle Midgyett's residence at 7110 E. Woodland Avenue, Kansas City, Missouri. Those 8 packages had a total weight of approximately 289 pounds.

28. Calls intercepted between Brown and Gladstone confirmed that Gladstone and Francois received a marijuana shipment on that date.

29. UPS records confirmed that all 15 packages were sent from a UPS store located on Baseline Road, Mesa, Arizona.

30. On May 19, 2009, Michael Francois was intercepted asking Tamary Brown to wire money for a marijuana shipment.

31. Surveillance followed Brown to a meeting with Gladstone and Francois at Francois's residence in Kansas City, Missouri.

32. After the meeting Brown was followed to the Bank of America located at 63<sup>rd</sup> and Prospect, Kansas City, and photographed stuffing \$5,010 in cash into the drive through teller.

33. While making this deposit, Brown contacted Eulet King by phone to verify King's address that should go on the deposit slip.

34. On May 20, 2009, Brown deposited \$3,990 into Eulet Kings' account.

35. On May 27, 2009, Francois and Gladstone, used Brown's phone, to discuss making a move and having Brown be the money courier for the drug proceeds.

36. On June 1, 2009, GPS analysis of Francois' phone indicated he was at Eulet King's residence in Glendale, Arizona.

37. On June 2, 2009, Michael Francois mailed 16 packages from a UPS store in Mesa, Arizona.

38. 8 packages were sent to Tamary Brown's residence and the other 8 were sent to Radell Bradford.

39. All 16 packages weighed approximately 30 pounds each.

40. Agents seized 8 of the 16 packages at the UPS distribution hub in Kansas City, Kansas.

41. From May 15, 2009 through June 3, 2009, Francois arranged for a minimum of 43 boxes of marijuana to be shipped to Kansas City via UPS. Each package weighed approximately 30 pounds.

42. GPS tracking of Francois' phone revealed that he returned to Arizona on June 15, 2009.

43. Conversation between Francois and King in June of 2009, verified that Francois had been trafficking marijuana for 8 years. Francois stated he believed the seizure occurred because Gladstone had improperly packaged the marijuana.

44. Tamary Brown was suppose to transport a shipment of money to Phoenix, Arizona prior to June 5, 2009. Brown refused after arriving at the bus station and observing the Kansas City, Missouri, bus interdiction squad.

45. Gladstone McDowell and Denaud Egana (a.k.a. Yosiphath) transported the currency to Phoenix, after Tamary Brown refused.

46. On July 20, 2009, Francois contacted "chicken head" and informed him that Francois had deposited \$9,000 into "chicken head's" account.

47. IRS confirmed the \$9,000 deposit into a bank account bearing the name of Keith Matthews.

48. In October of 2009, Delroy Buckley was intercepted talking with Francois. They discussed the price at which Buckley was trying to move his product, and the fact that Kansas City was saturated with high grade marijuana.

49. On October 8, 2009, Delroy Buckley called Rita Holmes-Buckley and described the marijuana he had received from Francois as "very pretty shit." Rita advised Delroy to stash the marijuana in a truck and not to tell anyone where it was located.

50. On October 10, 2009, Delroy Buckley transported marijuana proceeds from Kansas to Missouri to pay Francois for marijuana he acquired from Francois on October 8, 2009.

51. On October 10, 2009, Delroy Buckley and Rita Holmes-Buckley had a phone conversation and Rita indicated the payment they made to Francois may be \$1,000 short.

52. A confidential informant stated that from November of 2004, through February of 2009, he/she made arrangements to ship a minimum of 23,000 pounds (10,454.5 kilograms) of marijuana from Phoenix, Arizona to Kansas City for Gladstone McDowell and Michael Francois.

All in violation of Title 21, United States Code, Section 846.

## **COUNT 2**

Beginning on or about October 11, 2005, the exact date being unknown to the Grand Jury, and continuing to on or about November 4, 2009, both dates being approximate and inclusive, in the District of Kansas and elsewhere, the defendants,

**GLADSTONE MCDOWELL,  
a.k.a. "The Dread,"  
MICHAEL FRANCOIS,  
a.k.a. "Peter"  
a.k.a. "Curtis Pitter"  
a.k.a. "Michael Williams,"  
a.k.a. "Martin Trevor Mario,"  
a.k.a. "Joseph Stephenson Calvin Melrose,"  
a.k.a. "Peter Paterson,"  
a.k.a. "Paule Blake,"  
a.k.a. "Stephenson Calvin Melrose Joseph",  
MARLON FORRESTER,  
and  
TAMARY BROWN,**

unlawfully, knowingly and intentionally, engaged in a continuing criminal enterprise, together with each other and with other persons known and unknown to the Grand Jury, that is, the distribution and possession with intent to distribute marijuana in violation of Title 21, United States Code, Section 841(a)(1), which are part of a continuing series of

violations of Title 21, United States Code, and were undertaken in concert with five or more persons with respect to whom:

**GLADSTONE MCDOWELL,**  
a.k.a. "The Dread",  
**MICHAEL FRANCOIS,**  
a.k.a. "Peter",  
a.k.a. "Curtis Pitter",  
a.k.a. "Michael Williams",  
a.k.a. "Martin Trevor Mario",  
a.k.a. "Joseph Stephenson Calvin Melrose",  
a.k.a. "Peter Paterson",  
a.k.a. "Paule Blake",  
a.k.a. "Stephenson Calvin Melrose Joseph",  
**MARLON FORRESTER,**  
and  
**TAMARY BROWN,**

together with each other and with other persons known and unknown to the Grand Jury, occupied a position of organizer, supervisor and manager over the following individuals: Eulet King, Mechien McDowell, Dwight Rhone, Theodore McDowell, Sheldon McIntosh, Samora McIntosh, Ibrahim Kane, Deidre Turner and Keesha McDowell, and other persons known and unknown, to the Grand Jury, and that

**GLADSTONE MCDOWELL,**  
a.k.a. "The Dread",  
**MICHAEL FRANCOIS,**  
a.k.a. "Peter",  
a.k.a. "Curtis Pitter",  
a.k.a. "Michael Williams",  
a.k.a. "Martin Trevor Mario",  
a.k.a. "Joseph Stephenson Calvin Melrose",  
a.k.a. "Peter Paterson",  
a.k.a. "Paule Blake",  
a.k.a. "Stephenson Calvin Melrose Joseph",  
**MARLON FORRESTER,**  
and  
**TAMARY BROWN,**

derived substantial income or resources from the continuing criminal enterprise, in violation of Title 21, United States Code, Section 848.

**COUNT 3**

On or about September 10, 2009, at approximately 8:52 a.m. in the District of Kansas and elsewhere, the defendants,

**DELROY BUCKLEY,  
a.k.a. "Blacks",  
and  
RITA HOLMES-BUCKLEY,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein. All in violation of Title 21, United States Code, Section 843(b).

**COUNT 4**

On or about September 10, 2009, at approximately 12:12 p.m. in the District of Kansas and elsewhere, the defendants,

**DELROY BUCKLEY,  
a.k.a. "Blacks",  
and  
RITA HOLMES-BUCKLEY,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein. All in violation of Title 21, United States Code, Section 843(b).

**COUNT 5**

On or about September 10, 2009, at approximately 3:55 p.m., in the District of Kansas and elsewhere, the defendants,

**DELROY BUCKLEY,  
a.k.a. "Blacks",  
and  
RITA HOLMES-BUCKLEY,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein. All in violation of Title 21, United States Code, Section 843(b).

**COUNT 6**

On or about September 10, 2009, at approximately 4:30 p.m. in the District of Kansas and elsewhere, the defendants,

**DELROY BUCKLEY,  
a.k.a. "Blacks",  
and  
MICHAEL FRANCOIS,  
a.k.a. "Peter",  
a.k.a. "Curtis Pitter",  
a.k.a. "Michael Williams",  
a.k.a. "Martin Trevor Mario",  
a.k.a. "Joseph Stephenson Calvin Melrose",  
a.k.a. "Peter Paterson", and  
a.k.a. "Paule Blake",  
a.k.a. "Stephenson Calvin Melrose Joseph",**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein. All in violation of Title 21, United States Code, Section 843(b).

**COUNT 7**

Beginning on or about October 11, 2005, and continuing until in or about 2009, the exact dates being unknown to the Grand Jury, in the District of Kansas and elsewhere, the defendants,

**GLADSTONE MCDOWELL,  
a.k.a "The Dread",  
MICHAEL FRANCOIS,  
a.k.a "Peter",  
a.k.a "Curtis Pitter",  
a.k.a "Michael Williams",  
a.k.a "Martin Trevor Mario",  
a.k.a "Joseph Stephenson Calvin Melrose",  
a.k.a "Peter Paterson",  
a.k.a "Paule Blake",  
a.k.a "Stephenson Calvin Melrose Joseph",  
MARLON FORRESTER,  
TAMARY BROWN,  
DELROY BUCKLEY,  
a.k.a "Blacks",  
RITA HOLMES-BUCKLEY,  
DEIDRE TURNER,  
EULET KING,  
and  
KEESHA MCDOWELL,**

together and with others known and unknown to the Grand Jury, knowingly combined, conspired, confederated and agreed among themselves and each other to commit the following offenses against the United States: knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, conducted and attempted to conduct such a financial transaction (1) with the intent to promote the carrying on of specified unlawful activity, and (2) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title

18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i). This was all in violation of Title 18, United States Code, Section 1956(h).

### **Overt Acts**

In furtherance of said conspiracy and to effect the objects thereof, the following overt acts, among others, were committed within the District of Kansas and elsewhere:

1. Michael Francois directed Devon Thomas to acquire cashiers checks for the closing costs of 8421 Oldham Road, Kansas City, Missouri. The closing documents were signed on October 27, 2005, in Leawood, Kansas.

2. On May 19, 2009, Michael Francois provided drug proceeds to be deposited into the bank account of Eulet King.

3. Michael Francois, using the alias Stephenson Joseph was to be the recipient of a package seized on February 20, 2008, which contained \$366,040 in U.S. Currency.

4. On July 20, 2009, Michael Francois deposited \$9,000 into the account of Keith Matthews.

5. On October 10, 2009, Michael Francois received a cash payment from Delroy Buckley for a quantity of marijuana.

6. Prior to the closing of 8421 Oldham Road on October 27, 2005, Gladstone McDowell transferred multiple monetary instruments to the closing company located in Leawood, Kansas.

7. Gladstone McDowell concealed his true source of income on his loan application for the property located at 8421 Oldham Road, Kansas City, Missouri, and concealed that Michael Francois was to be the true owner of that property.

8. In November 2007, Gladstone McDowell participated in transporting \$139,980

in U.S. Currency.

9. In November of 2007, Marlon Forrester participated in transporting \$139,980 in U.S. Currency.

10. On February 20, 2008, Marlon Forrester was present with Tamary Brown in Las Vegas trying to pick up a package containing \$366,040 in U.S. Currency.

11. In August, 2007, Tamary Brown structured \$14,000 in cash into Eulet King's bank account.

12. On February 20, 2008, Tamary Brown attempted to pick up a package in Las Vegas, Nevada containing \$366,040.

13. On May 19, and May 20, 2009, Tamary Brown made cash deposits totaling \$9,000 into Eulet King's bank account.

14. In July of 2009, Tamary Brown sent a text message she had received from Eulet King to Michael Francois with the bank account information of Keith Matthews.

15. In August, 2007, Eulet King received \$14,000 in drug proceeds into her bank account.

16. In May of 2009, Eulet King received \$9,000 in drug proceeds into her bank account.

17. In July of 2009, Eulet King sent a text message to Tamary Brown with the bank account information of Keith Matthews.

18. On October 10, 2009, Delroy Buckley and Rita Holmes-Buckley used the proceeds of marijuana sales to purchase additional quantities of marijuana from Michael Francois.

19. Delroy Buckley and Rita Holmes-Buckley concealed the proceeds from their

marijuana trafficking in a safe deposit box.

20. On May 20, 2009, Keesha McDowell deposited \$9,000 cash into the bank account of the Jamaican Mini Mart. She immediately converted that cash into a cashiers check that was used to purchase equipment for a business owned by Mechieen McDowell.

**COUNT 8**

On or about October 27, 2005, in the District of Kansas and elsewhere, the defendants,

**GLADSTONE MCDOWELL,  
a.k.a. "The Dread",  
and  
MICHAEL FRANCOIS,  
a.k.a. "Peter",  
a.k.a. "Curtis Pitter",  
a.k.a. "Michael Williams",  
a.k.a. "Martin Trevor Mario",  
a.k.a. "Joseph Stephenson Calvin Melrose",  
a.k.a. "Peter Paterson", and  
a.k.a. "Paule Blake",  
a.k.a. "Stephenson Calvin Melrose Joseph",**

along with others known and unknown to the Grand Jury, did knowingly and intentionally conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that did cause the transfer of more than one monetary instrument and caused those monetary instruments to be purchased from a financial institution which is engaged in interstate commerce, in that Francois provided United States Currency to an individual to purchase two cashiers checks. The cashier checks were then used as a down payment for a residence located at 8421 Oldham Road, Kansas City, Missouri. Bank of America cashier check 4615619 dated 10/11/2005, in the amount of \$38,000 and Eastern Financial Florida Credit Union cashiers check 324850963, dated 10/11/2005, in the amount of \$7,000

were transferred from Florida and ultimately to Leawood, Kansas, where they were presented at the real estate closing for 8421 Oldham Road, Kansas City, Missouri. The currency used to purchase the cashiers checks involved the proceeds of a specified unlawful activity, that is: conspiracy to possess with the intent to distribute and to distribute a controlled substance in violation of Title 21, United States Code, Sections 846 and 841, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source and control of the proceeds of said unlawful activity; and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, the funds used to purchase the cashiers checks represented the proceeds of some form of unlawful activity. In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

**COUNT 9**

On or about October 10, 2009, in the District of Kansas and elsewhere, the defendants,

**DELROY BUCKLEY,  
a.k.a. "Blacks",  
RITA HOLMES-BUCKLEY,  
and  
MICHAEL FRANCOIS,  
a.k.a. "Peter",  
a.k.a. "Curtis Pitter",  
a.k.a. "Michael Williams",  
a.k.a. "Martin Trevor Mario",  
a.k.a. "Joseph Stephenson Calvin Melrose",  
a.k.a. "Peter Paterson", and  
a.k.a. "Paule Blake",  
a.k.a. "Stephenson Calvin Melrose Joseph",**

aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly conduct a financial transaction affecting interstate and foreign commerce, to wit: transferred and delivered United States currency in the amount of \$45,000, that was transported from the State of Kansas to the State of Missouri to the supplier of illegal narcotics in payment for marijuana that was previously received, which involved the proceeds of a specified unlawful activity, that is distribution of marijuana, with the intent to promote the carrying on such specified unlawful activity, and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

This is all in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (c)(3), (c)(4)(A)(ii), (c)(5) and 2.

**COUNT 10**

On or about June 8, 2009, in the District of Kansas and elsewhere, the defendants,

**RADELL BRADFORD,  
EULET KING,  
TAMARY BROWN,  
and  
MICHAEL FRANCOIS,  
a.k.a. "Peter",  
a.k.a. "Curtis Pitter",  
a.k.a. "Michael Williams",  
a.k.a. "Martin Trevor Mario",  
a.k.a. "Joseph Stephenson Calvin Melrose",  
a.k.a. "Peter Paterson",  
a.k.a. "Paule Blake", and  
a.k.a. "Stephenson Calvin Melrose Joseph",**

along with persons, both known and unknown to the Grand Jury, knowingly and intentionally possessed with intent to distribute more than 50 kilograms of marijuana, a

controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(c) and Title 18, United States Code, Section 2.

### **FORFEITURE ALLEGATION**

1. The allegations contained in Counts 1 through 10 of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 21, United States Code, Sections 853(a)(1), 853(a)(2) and 853(p) and Title 18, United States Code, Section 982(a)(1) and Rule 32.2(a).

As a result of the commission of the violations charged in Counts 1 through 10 of this Indictment,

**Gladstone McDowell, Michael Francois, Tamary Brown, Marlon Forrester, Radell Bradford, Mechieen McDowell, Keesha McDowell, Dwight Rhone, Theodore McDowell, Sheldon McIntosh, Samora McIntosh, Ibrahima Kane, Stephen Blackburn, Diedre Turner, Michelle Migyette, Denaud Egana, Delroy Buckley, Rita Holmes-Buckley, Michael Williams, and Eulet King,** defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds that the defendants obtained directly or indirectly as a result of the violations charged in Counts 1 through 10, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1 through 10 of this indictment, including but not limited to the following:

**REAL PROPERTY:**

All lots or parcels of land, together with their buildings, appurtenances, improvements, fixtures, attachments and easements, at the addresses listed and described below:

**3930 Chestnut Avenue, Kansas City, Missouri**

The South 21 feet of Lot 12 and the North 9.25 feet of Lot 13, CAROLYN ADDITION, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**3932 Chestnut Avenue, Kansas City, Missouri**

The South 34.38 feet of Lot 13, CAROLYN ADDITION, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**3435 Park, Kansas City, Missouri**

Tract 1 : The North 34 feet of Lot 170, SOUTH WINDSOR, a subdivision in Kansas City, Jackson County, Missouri, and

Tract 2: The North 18 feet of Lot 169 and the south 16 feet of Lot 170, SOUTH WINDSOR, a subdivision in Kansas City, Jackson County, Missouri,

Owners of record—Gladstone McDowell and Mechieen McDowell.

**3226 Brooklyn, Kansas City, Missouri**

The North 16 feet of Lot 16 and the South 17 feet of Lot 17, KAUFFMAN PLACE, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**1810 E. 67<sup>th</sup> Terrace, Kansas City, Missouri**

The East 23 feet of Lot 25 and the West 17 feet of Lot 26, BLENHEIM, a subdivision in Kansas City, Jackson County, Missouri.

Owners of record—Gladstone McDowell and Mechieen McDowell.

**5910 Lawn Avenue, Kansas City, Missouri**

Lots 118, 119 and 120, CYPRESS RIDGE, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**5920 Lawn Avenue, Kansas City, Missouri**

Lots 114 thru 117, inclusive, CYPRESS RIDGE, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell and Mechieen McDowell.

**8421 Oldham, Kansas City, Missouri**

Lot 35, OLDHAM FARMS NO. 2, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**4310, 4316, 4318, 4322, 4328, 4336-4340 Woodland, Kansas City, Missouri**

Tract 1 : Lots 281 through 289, and Lots 291 and 292, LLEWELLYN HEIGHTS RESURVEY, a subdivision in Kansas City, Jackson County, Missouri, and

Tract 2: Lot 293, LLEWELLYN HEIGHTS RESURVEY, a subdivision in Kansas City, Jackson County, Missouri,

Owner of record—Gladstone McDowell.

**FORFEITURE MONEY JUDGMENT:**

A sum of money equal to \$21,429,952 in United States Currency, representing the amount of proceeds obtained as a result of the offense alleged in Counts 1 through 10.

If the above-described forfeitable property, as a result of any act or omission of the defendant,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above-described forfeitable property, all in violation of Title 21, United States Code, Sections 841 and 853, including but not limited to the following:

**3930 Chestnut Avenue, Kansas City, Missouri**

The South 21 feet of Lot 12 and the North 9.25 feet of Lot 13, CAROLYN ADDITION, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**3932 Chestnut Avenue, Kansas City, Missouri**

The South 34.38 feet of Lot 13, CAROLYN ADDITION, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**3435 Park, Kansas City, Missouri**

Tract 1 : The North 34 feet of Lot 170, SOUTH WINDSOR, a subdivision in Kansas City, Jackson County, Missouri, and

Tract 2: The North 18 feet of Lot 169 and the south 16 feet of Lot 170, SOUTH WINDSOR, a subdivision in Kansas City, Jackson County, Missouri,

Owners of record—Gladstone McDowell and Mechieen McDowell.

**3226 Brooklyn, Kansas City, Missouri**

The North 16 feet of Lot 16 and the South 17 feet of Lot 17, KAUFFMAN PLACE, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**1810 E. 67<sup>th</sup> Terrace, Kansas City, Missouri**

The East 23 feet of Lot 25 and the West 17 feet of Lot 26, BLENHEIM, a subdivision in Kansas City, Jackson County, Missouri.

Owners of record—Gladstone McDowell and Mechieen McDowell.

**5910 Lawn Avenue, Kansas City, Missouri**

Lots 118, 119 and 120, CYPRESS RIDGE, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**5920 Lawn Avenue, Kansas City, Missouri**

Lots 114 thru 117, inclusive, CYPRESS RIDGE, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell and Mechieen McDowell.

**8421 Oldham, Kansas City, Missouri**

Lot 35, OLDHAM FARMS NO. 2, a subdivision in Kansas City, Jackson County, Missouri.

Owner of record—Gladstone McDowell.

**4310, 4316, 4318, 4322, 4328, 4336-4340 Woodland, Kansas City, Missouri**

Tract 1 : Lots 281 through 289, and Lots 291 and 292, LLEWELLYN HEIGHTS RESURVEY, a subdivision in Kansas City, Jackson County, Missouri, and

Tract 2: Lot 293, LLEWELLYN HEIGHTS RESURVEY, a subdivision in Kansas City, Jackson County, Missouri,

Owner of record—Gladstone McDowell.

All in violation of Title 21, United States Code, Section 853(a)(1) and (a)(2) and Title 18, United States Code, Section 982(a)(1) .

A TRUE BILL.

Dated: 11/5/2009

s/Foreperson  
FOREPERSON

s/Kim I. Martin, # 13407 for  
LANNY D. WELCH  
United States Attorney  
District of Kansas  
1200 Epic Center  
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Ks. S. Ct. No. 13267

(It is requested that trial of the above captioned case be held in Kansas City, Kansas.)

**PENALTIES:**

**Count 1: 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vii), and 846  
Conspiracy to distribute and possess with intent to distribute  
more than 1000 kilograms of marijuana**

- NLT 10 years imprisonment, NMT life imprisonment;
- NMT \$4,000,000.00 fine;
- NLT 5 years supervised release;
- \$100 special assessment fee;
- Forfeiture Allegations.

If the defendant has a prior conviction for a felony drug offense the penalties are:

- NLT 20 years imprisonment, NMT life imprisonment;
- NMT \$8,000,000.00 fine;
- NLT 10 years supervised release;
- \$100.00 special assessment fee;
- Forfeiture Allegations.

If the defendant has two or more prior convictions for a felony drug offense then the penalties are:

- Life imprisonment;
- NMT \$8,000,000.00 fine;
- NLT 10 years supervised release;
- \$100.00 special assessment fee;
- Forfeiture Allegations.

**Count 2: 21 U.S.C. § 848  
Continuing Criminal Enterprise (CCE)**

- NLT 20 years imprisonment, NMT life imprisonment;
- NMT \$2,000,000.00 fine;
- NMT 5 years supervised release;
- \$100.00 special assessment fee;
- Forfeiture Allegations.

If the defendant has a prior conviction for CCE then the penalties are:

- NLT 30 years imprisonment, NMT life imprisonment;
- NMT \$4,000,000.00 fine;
- NMT 5 years supervised release;
- \$100.00 special assessment fee;
- Forfeiture Allegations.

**Count 3-6: 21 U.S.C. § 843(b)**  
**Use of Communication facility in causing or facilitating the commission of felonies under the Controlled Substances Act or the Controlled Substances Import and Export Act**

- NMT 4 years imprisonment;
- NMT \$ 30,000.00 fine;
- NMT 3 years supervised release;
- \$100.00 special assessment fee;
- Forfeiture Allegations.

**Count 7: 18 U.S.C. § 1956(h)**  
**Conspiracy to commit Money Laundering**

- NMT 20 years imprisonment;
- NMT \$ 500,000.00 fine or twice the value of the “property;”
- NMT 3 years supervised release;
- \$100.00 special assessment fee;
- Forfeiture Allegations.

**Count 8: 18 U.S.C. § 1956(a)(1)(B)(i), and 2**  
**Money laundering**

- NMT 20 years imprisonment;
- NMT \$ 500,000.00 fine or twice the value of the “property;”
- NLT 3 years supervised release;
- \$100 special assessment fee;
- Forfeiture Allegations.

**Count 9: 18 U.S.C. § 1956(a)(1)(A)(i), (c)(3), (c)(4)(A)(ii), (c)(5) and 2**  
**Money laundering**

- NMT 20 years imprisonment;
- NMT \$ 500,000.00 fine or twice the value of the “property;”
- NLT 3 years supervised release;
- \$100 special assessment fee;
- Forfeiture Allegations.

**Count 10: 21 U.S.C. § 841(a)(1), (b)(1)(c) and 18 U.S.C. § 2  
Possession with the Intent to Distribute a Controlled Substance**

- NMT 20 years imprisonment;
- NMT \$1,000,000 Fine
- NLT 3 years supervised release;
- \$100 special assessment fee;

If the defendant has a prior conviction for a felony drug offense the penalties are:

- NMT 30 years imprisonment;
- NMT \$2,000,000 Fine
- NLT 6 years supervised release;
- \$100 special assessment fee;